

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW JERSEY

CITY OF NEWARK,

Plaintiff,

v.

GEO RE-ENTRY GROUP, LLC; ABC CORP
(A FICTITIOUS COMPANY) 1-100,

Defendant(s).

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CIVIL CASE NO.:
2:25-cv-2225-JKS-LDW

**ORDER TO SHOW CAUSE
FOR INJUNCTIVE RELIEF TO PERMIT
ENTRY FOR INSPECTION WITH
TEMPORARY RESTRAINTS TO CEASE
OCCUPANCY AND CONSTRUCTION**

THIS MATTER, having been brought before the Court by Morrison Kent Fairbairn, Esquire, of Michael A. Armstrong & Associates, LLC, attorney for Plaintiff, City of Newark, seeking emergent relief based upon the facts set forth in the Declarations of City of Newark Officials filed in support of Plaintiff's Motion for Injunctive Relief and a Temporary Restraining Order and the court having determined that this matter may be commenced by Order to Show Cause proceeding pursuant to Federal Rule of Civil Procedure 65, and for good cause shown;

IT IS on this _____ day of April 2025,
ORDERED that the Defendant(s), GEO Re-Entry Group, LLC or GEO Group, Inc., is hereby enjoined from and shall cease occupancy and construction, at the property known as Delaney Hall, located at 451 Doremus Avenue, in the City of Newark, New Jersey,

pending inspections of the premises by the City of Newark, in compliance with state and local laws since the Declarations filed by Plaintiff demonstrate that immediate and irreparable injury, or loss will result to Plaintiff from Defendant's continued activity at the property without the performance of the appropriate inspections and the provision of the appropriate permits.

IT IS FURTHER ORDERED that Defendants shall appear and show cause before the undersigned Judge on the _____ day of _____, 2025, before the Superior Court at Newark, New Jersey at _____ o'clock or as soon thereafter as the parties can be heard, why judgment should not be entered and ordered that:

A. Defendant(s) is hereby enjoined from and shall cease occupancy and construction, at the property known as Delaney Hall, located at 451 Doremus Avenue, in the City of Newark, New Jersey, pending inspections of the premises by the City of Newark, in compliance with state and local laws.

B. Defendant(s) is prohibited from engaging in, continuing to engage in, or doing any acts or practices in violation of any City Ordinances, the property maintenance codes, uniform construction codes, fire codes, health and safety codes, including but not limited to the acts and practices alleged in the Verified Complaint;

C. Defendant(s) shall make the Property immediately available for further inspection and code enforcement.

IT IS FURTHER ORDERED THAT:

1. A copy of this Order to Show Cause with Temporary Restraints and all supporting affidavits or certifications submitted in support of this application shall be deemed effectuated upon all parties upon its upload to the Court's Electronic Filing System.
2. Defendant(s) shall have leave to move for the dissolution or modification of this Order pursuant to Fed. R. Civ. P. 65(b)(4).
3. Defendant(s) shall file, no later than _____ days from the date of service of this Order, a written response with this Court, and shall appear in response to this Order; in default thereof, the action may proceed ex parte and the Court may enter such other relief as the court deems equitable and just including final judgment against Defendant(s) for the relief requested in Plaintiff's Complaint.

Honorable James K. Semper, U.S.D.J.

